

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LYNWOOD MOREAU, <i>et al.</i>	§	
	§	
<i>Plaintiff,</i>	§	
	§	CIVIL ACTION NO. 4:19-CV-00646
v.	§	
	§	
HARRIS COUNTY, TEXAS,	§	
	§	
<i>Defendant.</i>	§	

STIPULATION

Plaintiffs Lynwood Moreau, *et al.* and Defendant Harris County, Texas (“Harris County”) hereby agree and stipulate that within the relevant time, the current Plaintiffs were employed by the Harris County Sheriff’s Office. Specifically:

1. Within the relevant time, Plaintiff Christopher Adolph was employed by the Harris County Sheriff’s Office as a Lieutenant in Patrol and Special Operations Livestock/Mounted.
2. Within the relevant time, Plaintiff Eric Batton was employed by the Harris County Sheriff’s Office as a Lieutenant in Criminal Investigations, Patrol, and Homeland Security.
3. Within the relevant time, Plaintiff Paul Bruce was employed by the Harris County Sheriff’s Office as a Lieutenant in Patrol.
4. Within the relevant time, Plaintiff Brian Buccini was employed by the Harris County Sheriff’s Office as a Lieutenant in Special Operations Criminal Warrants and Special Operations Tactical Response.
5. Within the relevant time, Plaintiff Charles Bryan was employed by the Harris County Sheriff’s Office as a Lieutenant in Patrol.

6. Within the relevant time, Plaintiff Simon Cheng was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol Support Services.

7. Within the relevant time, Plaintiff Cedrick Collier was employed by the Harris County Sheriff's Office as a Lieutenant in Special Operations Tactical Response and Special Operations Vehicular Crimes.

8. Within the relevant time, Plaintiff Susan Cotter was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol Support Services.

9. Within the relevant time, Plaintiff Earl Dean, was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol Support Services.

10. Within the relevant time, Plaintiff Nathan Douglas was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

11. Within the relevant time, Plaintiff Jeffrey Easthagen was employed by the Harris County Sheriff's Office as a Lieutenant in Maritime Tactical Operations.

12. Within the relevant time, Plaintiff Linda Easthagen was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

13. Within the relevant time, Plaintiff Chris Ecke was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

14. Within the relevant time, Plaintiff Larry Franks was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

15. Within the relevant time, Plaintiff David Fusilier was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

16. Within the relevant time, Plaintiff Jorge Gonzalez was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

17. Within the relevant time, Plaintiff Jorge Gonzalez was employed by the Harris County Sheriff's Office as a Lieutenant in Training Academy.

18. Within the relevant time, Plaintiff Wendell Kuhlman was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

19. Within the relevant time, Plaintiff Toby Kroeger was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

20. Within the relevant time, Plaintiff John Lightfoot was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

21. Within the relevant time, Plaintiff Edward Lopez was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

22. Within the relevant time, Plaintiff James Lovett was employed by the Harris County Sheriff's Office as a Lieutenant in Criminal Investigations and Homicide / Cold Case Unit.

23. Within the relevant time, Plaintiff Anthony McConnell was employed by the Harris County Sheriff's Office as a Lieutenant in Criminal Investigations.

24. Within the relevant time, Plaintiff Lynwood Moreau was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

25. Within the relevant time, Plaintiff Jeffrey Stauber was employed by the Harris County Sheriff's Office as a Lieutenant in Criminal Investigations.

26. Within the relevant time, Plaintiff Darlene Thomas was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol Support Services and Homeland Security Administration.

27. Within the relevant time, Plaintiff Lonnie Tullos was employed by the Harris County Sheriff's Office as a Lieutenant in Tactical Response and Patrol


28. Within the relevant time, Plaintiff Jonathon Viningre was employed by the Harris County Sheriff's Office as a Lieutenant in Patrol.

29. Within the relevant time, Plaintiff James Wagner was employed by the Harris County Sheriff's Office as a Lieutenant in Criminal Investigations.

30. Within the relevant time, Plaintiff Lameka White was employed by the Harris County Sheriff's Office as a Lieutenant in the Emergency Dispatch Center.

Agreed:


For Plaintiffs


For Harris County, Texas